

August 6, 2021

BLM California Desert District External Affairs DAC members
Attn: Michelle Van Der Linden, BLM California
District Public Affairs
22835 Calle San Juan de Los Lagos
Moreno Valley, CA 92553

Subject: WMRNP, DRECP, DAC Subgroup for Mojave Trails NM – Comments for DAC meeting, 7 August 2021

Dear Council members;

We are pleased to see the resumption of the DAC meetings after more than four years of successive disruptions that included suspension of the DAC and scheduling problems encumbered by changes in the BLM's administrative processes as well as Covid-19. We appreciate the BLM staff and council members who have invested tremendous effort to make the DAC meetings productive for the public and for Stakeholders.

From the perspective of recreational users of public lands who are hobby collectors, or rockhounds, planning guidelines enshrined in FLPMA and NEPA had the alarming effect of disallowing rockhounding on most federally administered public lands since the early 1970s. It resulted in shrinking habitat for rockhounds to pursue our hobby. Many rock collecting areas within the footprint of the Desert District have been popular dating back to the 1930s and '40s (earlier for some localities), and over the years we have seen more of them put off limits outright. Road closures, which make access difficult if not impossible, has had the same effect and is just as concerning. (Carrying a bucket of rocks and water over long distances is simply not feasible, especially for children and seniors.)

The rockhound community grew still more concerned that more draconian restrictions would result from the West Mojave Route Network Project (WEMO/WMRNP), the Desert Renewable Energy Conservation Plan (DRECP), and also the creation of Mojave Trails National Monument ("Mojave Trails"), which encompasses many popular hobby collecting areas. In recent years, some of us have been encouraged about the BLM's consideration for hobby collecting and commitment to ensuring continued access to collecting areas on public lands within the Desert District footprint.

However, after four years of disruptions to the DAC meeting schedule, policy changes within the Department of the Interior, personnel transitions, and disregard for processes and procedures enshrined in law (including NEPA and APA), we would like to be reassured. Below are three comments and questions we have relevant to today's meeting agenda.

1. **WMRNP and DRECP reconciliation.** Back in 2019, rockhounds understood that a reconciliation of WMRNP and DRECP would resolve conflicts and overlaps between the two. As a practical matter for members of the public who visit collecting areas in the desert that they have visited in the past via routes they have used in the past, the time to find out

what is accessible is not when they encounter a physical barrier once they're out in the desert. **Where can rockhounds find current AND intelligible maps that reflect the reconciliation of WMRNP and DRECP?** (PDF maps we have seen are not helpful.)

2. **DRECP accommodations for hobby collecting.** When the DRECP ROD was approved in September 2016, Vicki Campbell, DRECP program manager, specifically advised rockhounds during a conference call that the ROD reflected significant accommodations to rockhounds based on their numerous comment letters. She noted that Development Focus Areas (DFAs) and other potential encroachments by industrial-scale projects were removed or redrawn where adjacencies or overlaps created potential conflicts.

This now appears to be in doubt. A BLM news release on January 13, 2021, announced that the BLM proposed making modifications to the California Desert National Conservation Lands (CDNCL), which underlies DRECP. The BLM press release invited “comments on how land designations identified in the plan might affect development of solar, wind or other renewable energy [RE] resources.”

Specifically, in the light of the prodigious number and fast-track pace of permitting industrial scale RE projects in the desert, **is the BLM proposing to restore the old DFAs that were redrawn to accommodate recreational users in the 2016 ROD? May we receive a status update in a future DAC meeting on this BLM proposal?**

3. **We support the creation of a DAC subgroup that would be involved in drafting the Mojave Trails National Monument management plan.** Rockhounds look forward to participating in it, as many hobby collecting areas lie within its footprint.

Sincerely,

Lisbet Thoresen, public lands representative
San Diego Mineral & Gem Society
27636 Ynez Road #L-7230
Temecula, CA 92591

Dave Smith, President
San Diego Mineral & Gem Society
1770 Village Place
Balboa Park
San Diego, CA 92101-1651

Jim Parrish, Museum Curator and Board member
San Diego Mineral & Gem Society
1770 Village Place
Balboa Park
San Diego, CA 92101-1651

Ruth Hidalgo, PLAC
Antelope Valley Gem and Mineral Club
Lancaster, CA 93534

Bill E. Depue, Founder and President
Diamond Pacific Tool Corporation
2620 Main Street
Barstow, CA 92311

John J. Pickett, rockhound and Diamond
Pacific Tool Corp employee
2620 Main Street
Barstow, CA 92311

Joe Sumners
Lenwood, CA and Early, TX